

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW HAMPSHIRE**

In re:

CHAPTER 11

Isaacson Steel, Inc.
Isaacson Structural Steel, Inc.

Case No. 11-12415-JMD
Case No. 11-12416-JMD

Debtors

Jointly Administered

**DEBTORS' MOTION FOR COMBINED HEARING ON ADEQUACY OF DISCLOSURE
STATEMENT AND CONFIRMATION OF PLAN OF REORGANIZATION**

The Debtors in Possession, Isaacson Structural Steel, Inc. and Isaacson Steel, Inc. (individually, "ISSI" and "Steel" and, collectively, the "Debtors") respectfully move this Court as follows:

1. The Debtors have filed their Disclosure Statement Dated September 18, 2013 Pertaining to Plan of Reorganization of Even Date and Debtors' Plan of Reorganization dated September 18, 2013 (the "Disclosure Statement" and "Plan").
2. The Plan is based on the so-called Global Settlement Agreement entered into by and among the Debtors, the Official Committee of Unsecured Creditors (the "Committee"), Passumpsic Savings Bank ("Passumpsic" or "PSB"), the New Hampshire Business Finance Authority (the "BFA") and Turner Construction, Inc. ("Turner") and approved by the sole director of the Debtors that has been the subject of two (2) lengthy hearings and has the support of the vast majority of creditors in this case measured by dollars and the vast majority of creditors measured by number assuming that Unsecured Creditors will follow the recommendation of the Committee.
3. Under the facts and circumstances of this case, the Debtors believe that it is appropriate to conduct a hearing on the adequacy of the Disclosure Statement and, assuming that this Court finds that it gave Creditors "adequate information", hear and confirm the Plan immediately after the entry of the Order approving the Disclosure Statement.

WHEREFORE, the Debtors respectfully request this Court to issue and enter an Order in

the form attached hereto, with such amendments or modifications as this Court deems necessary or appropriate.

DATED: September 19, 2013

Respectfully submitted,

/s/ William S. Gannon

William S. Gannon, BNH 01222

Attorney for:

**Isaacson Structural Steel, Inc. and
Isaacson Steel, Inc.**

WILLIAM S. GANNON, PLLC
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CERTIFICATE OF SERVICE

I hereby certify that on this date I served the foregoing pleading on each person named below by causing it to be filed electronically via the CM/ECF filing system or mailed by first-class United States Mail, postage pre-paid, or in such other manner as may be indicated:

All Persons on the attached Service Lists (if any).

DATED: September 19, 2013

/s/ Mary Ann Joyce

Jeanne Arquette-Koehler
Mary Ann Joyce

COMBINED APPEARANCES SERVICE LIST
In Re: Isaacson Steel, Inc., Chapter 11, Case No. 11-12415-JMD
In Re: Isaacson Structural Steel, Inc., Chapter 11, Case No. 11-12416-JMD

Ann Marie Dirsra – ECF Assistant U.S. Trustee	For Isaacson Structural Steel
Gregory Moffett – ECF Joshua Menard – ECF For Passumpsic Savings Bank	Matthew Johnson - ECF For Northway Bank
Edward C. Dial, Jr. – ECF For Ford Motor Credit	Gina Fonte – ECF For The Richmond Group
Daniel Sklar – ECF Holly Kilibarda – ECF For Creditors' Committee	Peter Hermes – ECF For John Moriarty & Assoc.
David Azarian – ECF For American Aerial Services	Michey Long – ECF For Prime Steel Erecting
David Anderson – ECF Gayle P. Ehrlich - ECF For Cate Street Capital	George Marcus – ECF For NH BFA
Christopher Allwarden – ECF Honor Heath - ECF For PSNH	Rodney Stark – ECF For D.J. Driscoll and Company
Kristen Harris – ECF Jonathan Starble - ECF For Infra-Metals Co.	Lizabeth M. MacDonald - ECF For City of Berlin
David Chenelle – ECF For JM Coull, Inc.	Mark Derby – ECF For Presby Steel
Steven M. Notinger – ECF For Steven Griffin	David C. Green – ECF For RBS Citizens
Joseph Foster – ECF For The Eli L. Isaacson Family Trust	Geoffrey Coen – ECF Paula-Lee Chambers - ECF For Travelers Casualty
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